

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Donald V. Biase  
PO Box 646  
Essex Fells, NJ 07021

Tel: 973-618-1008

Chapter 7 Trustee

In Re:

Sure Thing Sales LLC,  
Debtor

Case No.: 24-15446 (RG)

Judge: Gambardella

Chapter: 7

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicant, Donald V. Biase, is the (check all that apply):

☒ Trustee: ☒ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☐ Debtor: ☐ Chap. 11 ☐ Chap. 13

☐ Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional Sean Raquet, CPA, LLC to serve as (check all that apply):

☐ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of \_\_\_\_\_

☒ Accountant for: ☒ Trustee ☐ Debtor-in-possession

☐ Official Committee of \_\_\_\_\_

☐ Other Professional:

☐ Realtor

☐ Appraiser

☐ Special Counsel

☐ Auctioneer

☐ Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because:

The Chapter 7 Trustee requires an experienced accountant to prepare tax returns,  
review bankruptcy claims, investigate potential avoidance actions and other financial  
matters related to closing the case.

4. The professional has been selected because:

The Applicant is familiar with Sean Raquet, CPA, LLC and Mr. Raquet's extensive  
experience in bankruptcy matters and believes that the firm is well qualified to serve  
as accountants.

5. The professional services to be rendered are as follows:

Accountants will be called upon to prepare tax returns, review bankruptcy claims,  
investigate potential avoidance claims and other financial matters related to closing the  
case.

6. The proposed arrangement for compensation is as follows:

Partners: \$375

Para-professionals: \$125

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: Sean Raquet, CPA, LLC and its managing member, Sean  
Raquet, provide services to me in matters completely unrelated to this case.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☐ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: June 26, 2024

/s/Donald V. Biase  
Donald Biase, Chapter 7 Trustee